

Exhibit 6

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 - - -

5
6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 :
10 APPLIES TO ALL CASES : NO.
11 : 1:17-MD-2804
12 :

13 - HIGHLY CONFIDENTIAL -

14 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

15 - - -

16 April 29, 2019

17 - - -

18 Videotaped deposition of
19 KATHERINE KEYES, Ph.D., taken pursuant to
20 notice, was held at the law offices of
21 Lief Cabraser, LLP, 250 Hudson Street,
22 New York, New York beginning at 9:08
23 a.m., on the above date, before Michelle
24 L. Gray, a Registered Professional
25 Reporter, Certified Shorthand Reporter,
26 Certified Realtime Reporter, and Notary
27 Public.

28 - - -

29 GOLKOW LITIGATION SERVICES
30 877.370.3377 ph | 917.591.5672 fax
31 deps@golkow.com

<p style="text-align: right;">Page 454</p> <p>1 the record.</p> <p>2 THE VIDEOGRAPHER: All</p> <p>3 right. The time is 5:18 p.m. Off</p> <p>4 the record.</p> <p>5 (Short break.)</p> <p>6 THE VIDEOGRAPHER: The time</p> <p>7 is 5:22 p.m. Back on the record.</p> <p>8 - - -</p> <p>9 EXAMINATION</p> <p>10 - - -</p> <p>11 BY MR. O'CONNOR:</p> <p>12 Q. Professor Keyes, I'm Andrew</p> <p>13 O'Connor, I represent one of the</p> <p>14 manufacturers in the case. I'm going to</p> <p>15 be asking you some questions on their</p> <p>16 behalf.</p> <p>17 In connection with preparing</p> <p>18 your report, did you review any marketing</p> <p>19 material used by opioid manufacturers?</p> <p>20 A. So, I reviewed what is cited</p> <p>21 in my report. This includes a number of</p> <p>22 different papers in the peer-reviewed</p> <p>23 literature that go over the marketing</p> <p>24 materials from --</p>	<p style="text-align: right;">Page 456</p> <p>1 Q. For that point?</p> <p>2 A. I'm -- I'm not -- I just --</p> <p>3 I'm sorry, I just want to understand the</p> <p>4 question. Am I relying on any other</p> <p>5 peer-reviewed materials for which --</p> <p>6 which point specifically?</p> <p>7 Q. For -- for any opinion on</p> <p>8 marketing use -- marketing materials used</p> <p>9 by opioid manufacturers.</p> <p>10 A. I'm relying on the material</p> <p>11 the -- to form the opinions, the material</p> <p>12 that I relied on is the material that is</p> <p>13 cited in this report.</p> <p>14 Q. Okay. So just to be clear,</p> <p>15 did you review any of the actual primary</p> <p>16 source material, which is to say, the</p> <p>17 material -- the marketing materials</p> <p>18 themselves in writing your report?</p> <p>19 A. So the --</p> <p>20 MS. RELKIN: Objection to</p> <p>21 form.</p> <p>22 THE WITNESS: -- material</p> <p>23 that I relied on to write my</p> <p>24 report included a broad range of</p>
<p style="text-align: right;">Page 455</p> <p>1 Q. Other than what you've cited</p> <p>2 in the report, did you review any</p> <p>3 marketing materials or studies --</p> <p>4 A. Everything that I reviewed</p> <p>5 has been provided. I'm familiar, as part</p> <p>6 of my expertise in opioid use disorders,</p> <p>7 more broadly with marketing materials</p> <p>8 that were used.</p> <p>9 Q. And what marketing materials</p> <p>10 are you familiar with through that</p> <p>11 experience?</p> <p>12 A. The only market -- the only</p> <p>13 materials that I cite in the report that</p> <p>14 I rely on for the opinions that I made,</p> <p>15 are the materials that are evaluated in</p> <p>16 the peer-reviewed literature, that</p> <p>17 overview the -- the evidence that was</p> <p>18 used to market prescription --</p> <p>19 Q. Are you relying on any other</p> <p>20 peer-reviewed materials other than what</p> <p>21 you've cited in the report?</p> <p>22 MS. RELKIN: For that</p> <p>23 opinion?</p> <p>24 BY MR. O'CONNOR:</p>	<p style="text-align: right;">Page 457</p> <p>1 peer-reviewed literature, articles</p> <p>2 that evaluate evidence that was</p> <p>3 used in marketing materials.</p> <p>4 More broadly, given 15 years</p> <p>5 of studying opioid use disorders,</p> <p>6 I'm familiar with marketing</p> <p>7 materials that were used. There</p> <p>8 was no marketing material that I</p> <p>9 relied on to form the opinion that</p> <p>10 is in this report.</p> <p>11 BY MR. O'CONNOR:</p> <p>12 Q. In 15 years what marketing</p> <p>13 materials related to pharmaceutical</p> <p>14 opioids did you review?</p> <p>15 A. There has been voluminous</p> <p>16 evidence, as I cite here, regarding</p> <p>17 distribution, sales and marketing of</p> <p>18 opioids.</p> <p>19 Q. Does any of the evidence</p> <p>20 you're referring to relate to any</p> <p>21 manufacturing defendants in this case?</p> <p>22 MS. RELKIN: Objection to</p> <p>23 form.</p> <p>24 You mean specific? Is that</p>

<p style="text-align: right;">Page 458</p> <p>1 what you said?</p> <p>2 THE WITNESS: Does any of</p> <p>3 the evidence that I'm referring to</p> <p>4 relate to any manufacturing -- I</p> <p>5 think the evidence that I've</p> <p>6 provided in this report relates to</p> <p>7 manufacturers of opioids.</p> <p>8 BY MR. O'CONNOR:</p> <p>9 Q. Professor Keyes, who are the</p> <p>10 manufacturing defendants in this case?</p> <p>11 A. There's a broad range of</p> <p>12 manufacturing defendants in the case.</p> <p>13 You know, I'm not -- I know that Purdue,</p> <p>14 Janssen, Teva, a number of other</p> <p>15 manufacturers are involved.</p> <p>16 Q. Can you name any other</p> <p>17 manufacturers as you sit here today?</p> <p>18 A. I would have to go back to</p> <p>19 my materials. You know, I think it's all</p> <p>20 cited in the complaint. The -- the</p> <p>21 opinions that I derived at for this</p> <p>22 report are not specific to any particular</p> <p>23 manufacturer unless I cite a specific</p> <p>24 product in the report. So all of the</p>	<p style="text-align: right;">Page 460</p> <p>1 Do you know who Art Van Zee</p> <p>2 is?</p> <p>3 A. Sorry, I'm just trying to</p> <p>4 find the specific place I reference that.</p> <p>5 Do you know what page it's on?</p> <p>6 So I -- the use of that</p> <p>7 article is for the statement, "From 1997</p> <p>8 to 2002, prescriptions for OxyContin for</p> <p>9 noncancer pain increased from</p> <p>10 approximately 670,000 in 1997 to" -- "to</p> <p>11 about 6.2 million in 2002. Prescriptions</p> <p>12 for cancer pain also increased about</p> <p>13 fourfold across the same period."</p> <p>14 Q. Back to my question. Do you</p> <p>15 know who Art Van Zee is?</p> <p>16 A. Do I know him personally?</p> <p>17 Q. Do you know who -- who he is</p> <p>18 generally?</p> <p>19 A. According to the article, he</p> <p>20 is an M.D., and he is affiliated with</p> <p>21 Stone Mountain Health Services.</p> <p>22 Q. Other than what you're</p> <p>23 reading right now, are you familiar with</p> <p>24 his credentials?</p>
<p style="text-align: right;">Page 459</p> <p>1 opinions that I've arrived at are about</p> <p>2 the overall emergence of an opioid</p> <p>3 epidemic in the United States.</p> <p>4 Q. In connection with Purdue,</p> <p>5 did you review any Purdue marketing</p> <p>6 materials yourself?</p> <p>7 A. In connection with Purdue?</p> <p>8 So what I've cited -- I -- I think I've</p> <p>9 answered the question. What I've cited</p> <p>10 in the -- in the report is the</p> <p>11 peer-reviewed literature that evaluates</p> <p>12 the evidence that was used for marketing</p> <p>13 materials.</p> <p>14 Q. I'm going to mark an exhibit</p> <p>15 that you cite in your report.</p> <p>16 (Document marked for</p> <p>17 identification as Exhibit</p> <p>18 Keyes-17.)</p> <p>19 BY MR. O'CONNOR:</p> <p>20 Q. It's a study by Art Van Zee.</p> <p>21 It's marked Exhibit 17.</p> <p>22 A. Can you tell me which</p> <p>23 citation number it is in the report?</p> <p>24 Q. I believe it's 15.</p>	<p style="text-align: right;">Page 461</p> <p>1 A. I'm not aware of other</p> <p>2 articles by Art Van Zee that I relied on</p> <p>3 for the opinions in this report.</p> <p>4 Q. To your knowledge, is he an</p> <p>5 epidemiologist?</p> <p>6 A. I have not evaluated his</p> <p>7 training.</p> <p>8 Q. Does he have any expertise</p> <p>9 related to the marketing of prescription</p> <p>10 opioids?</p> <p>11 MS. RELKIN: Objection.</p> <p>12 THE WITNESS: That's not</p> <p>13 information that was -- I think</p> <p>14 the statement in the -- where I</p> <p>15 cite his work is based on what is</p> <p>16 written here. I don't think it --</p> <p>17 I'm sorry, your question</p> <p>18 was: Do I have any knowledge of</p> <p>19 his expertise related to the</p> <p>20 marketing of prescription opioids?</p> <p>21 I'm not sure how that relates to</p> <p>22 the statement that "OxyContin for</p> <p>23 noncancer pain increased from</p> <p>24 approximately 670,000 to</p>